

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In re:

CHADWICK J. BUYNAK

* Debtor(s)

Case Number: 5-24-00805

Chapter: 13

CERTIFICATE OF MAILING

The undersigned employee in the office of:

Tullio DeLuca, Esquire

hereby certifies that a copy of the attached Notice of Motion to Sell Free and Clear of All Liens, Charges and Encumbrances was mailed today to all parties named on the mailing list attached hereto by regular first class mail.

DATED: November 18, 2024

SIGNED: /s/Lisa Manchak

TITLE: Legal Assistant

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

CHADWICK J. BUYNAK :
Debtor : CASE NO. 5-24-00805

CHADWICK J. BUYNAK :
Movant :
vs. :
SUSQUEHANNA COUNTY TAX CLAIM :
BUREAU, ROUNDPOINT MORTGAGE, :
LINDSEY A. CATOGGIO, INTERNAL :
REVENUE SERVICE, PA DEPARTMENT OF :
REVENUE and JACK N. ZAHAROPOULOS, :
ESQUIRE :
Respondents :

NOTICE OF DEBTOR'S MOTION TO APPROVE PRIVATE SALE OF REAL PROPERTY
FREE AND CLEAR OF ALL LIENS, CHARGES AND ENCUMBRANCES

NOTICE IS HEREBY GIVEN THAT:

Debtor, Chadwick J. Buynak resides at 89 Tompkins St., Apt 1, Pittston, PA and seeks leave to sell real property of the above captioned case located 887 Cottrell Rd, Thompson, PA, to Lindsey A. Catoggio , for the sum of One Hundred Thirty Thousand (\$130,000.00) Dollars. The sale is to be free and clear of all liens, charges and encumbrances, with all valid liens and encumbrances to be paid at time of closing.

The Debtors further request the Court to allow distribution of the proceeds from the sale of real property as follows:

- a. Any out-of-pocket expenses advanced by Tullio DeLuca, Esquire in connection with the sale of the aforementioned property, and which have not been reimbursed at the time of settlement along with an attorney fee of \$1,500.00;
- b. Any Notarization and/or incidental recording fees associated with the sale of the above property;
- c. Any transfer tax which is the responsibility of the seller herein;
- d. Any unpaid real estate taxes and other municipal claims/liens arising from property;
- e. Payment in full to Roundpoint Mortgage;

- f. Any amount in excess of the amount due to extinguish the outstanding mortgage on the real property shall be divided equally between the parties.
- g. That any other unpaid liens shall attach to the remaining sale proceeds;
- h. Debtor's exemption in the amount of \$26,785.00
- i. The net sale proceeds in an amount to pay the balance owed to the Chapter 13 Trustee, if any, from the above sale shall be paid to Jack N. Zaharopoulos, Esq., Chapter 13 Trustee, for distribution to creditors in accordance with the Debtor's confirmed Plan

The Sale is not subject to higher and better offers.

Any inquiries regarding the sale and/or to request for copies of the motion or a time and date to examine the property prior to the sale, can be made directly to Debtor's Counsel, Tullio DeLuca, Esquire.

Hearing on any Answers or Objections will be heard on January 07, 2025 at 10:00am. If no objection and request for hearing are timely filed with the Bankruptcy Clerk, 197 South Main Street, Wilkes-Barre, PA 18701 to the sale of the aforementioned real property on the above terms and conditions on or before **December 09, 2024**, the Court may grant the relief requested. If you desire to contest this matter, file a written objection in the form of responsive pleading and request a hearing with a copy to Tullio DeLuca, Esquire at the address below: Any filing must conform to the Rule of Bankruptcy Procedures unless the Court determines otherwise.

Date of Notice: November 18, 2024 Tullio DeLuca, Esquire
381 N 9th Avenue
Scranton, PA 18504
(570) 347-7764

Bradford Cty. Domestic Relat
Bradford County Courthouse, 301 Main Str
Towanda, PA 18848-1851

CCS Collections
725 Canton Street
Newton, MA 02062-2679

Capital One
PO Box 31293
Salt Lake City, UT 84131-0293

Capital One N.A.
by American InfoSource as agent
PO Box 71083
Charlotte, NC 28272-1083

Cavalry Portfolio Services
500 Summit Lake Dr.
Valhalla, NY 10595-2321

Cavalry SPV I, LLC
PO Box 4252
Greenwich, CT 06831-0405

Citibank
Box 6062
Sioux Falls, SD 57117

Concord
4343 N. Scottsdale Rd.
Suite 270
Scottsdale, AZ 85251-3352

DYSBEDPUZ 1, LLC
PO Box 406
Andover, NJ 07821-0406

GEISINGER
PO BOX 1123
MINNEAPOLIS, MN 55440-1123

Geisinger Health System
100 North Academy Avenue
Danville, PA 17822-0001

Guthrie Clinic
132 Colonial Dr
Towanda, PA 18848-8107

JEFFERSON CAPITAL SYSTEMS LLC
PO BOX 7999
SAINT CLOUD MN 56302-7999

LVNV Funding, LLC
55 Beattie Place
Greenville, SC 29601-2165

LVNV Funding, LLC
Resurgent Capital Services
PO Box 10587
Greenville, SC 29603-0587

Lindsey Catoggio
867 Cottrell Rd
Thompson, PA 18465

M&T BANK
PO Box 1508
Buffalo, NY 14240-1508

Northeastern Gastroenterology Assoc
1860 Fair Ave, Suite A
Honesdale, PA 18431-2108

ROUNDPOINT MORTGAGE SERVICING
CORPORATION
446 WRENPLACE ROAD
FORT MILL SC 29715-0200

Roundpoint Mortgage Servicing Corp.
P.O. Box 19409
Charlotte, NC 28219-9409

Small Business Administration
801 Tom Martin Drive, Suite 120
Birmingham, AL 35211-6424

Susquehanna County Domestic Relations
31 Lake Ave.
PO Box 218
Montrose, PA 18801-0218

The Dime Bank
820 Church St.
Honesdale, PA 18431-1851

United States Trustee
US Courthouse
1501 N. 6th St
Harrisburg, PA 17102-1104

Wayne Memorial Hospital
Attn: Collection Dept.
601 Park St
Honesdale, PA 18431-1498

JACK N ZAHAROPOULOS
ATTN CHAPTER 13 TRUSTEE
8125 ADAMS DRIVE SUITE A
HUMMELSTOWN PA 17036-8625

Lindsey A Catoggio
c/o John J. Martin, Esquire
1022 Court Street
Honesdale, PA 18431-1925